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*Co-Lead Counsel*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

*In re: Hyundai and Kia Engine  
Litigation II*

Case No. 8:18-cv-02223-JLS-JDE

**SUPPLEMENTAL DECLARATION  
OF MATTHEW D. SCHELKOPF IN  
FURTHER SUPPORT OF MOTION  
FOR CLASS COUNSEL FEE AND  
EXPENSE AWARD**

Date: September 8, 2023  
Time: 10:30 a.m.  
Hon. Josephine L. Staton  
Courtroom: 8A

I, Matthew D. Schelkopf, declare as follows:

1. I am an attorney admitted *pro hac vice* in this litigation, and a partner at the law firm of Sauder Schelkopf LLC (“Sauder Schelkopf”), and counsel of record for Plaintiffs in *In re: Hyundai and Kia Engine Litigation II*, No. Case No. 8:18-cv-02223-JLS-JDE (C.D. Cal.). I could and would competently testify to the matters stated in this declaration based on my personal knowledge or discussions with counsel in my firm.

2. This Court appointed me to serve as co-Lead Counsel alongside Steve Berman of Hagens Berman Sobol Shapiro LLP, and further appointed Gretchen Freeman Cappio of Keller Rohrback L.L.P. to serve as Settlement Counsel (together, “Class Counsel”) in this action. ECF No. 99, at 26.

3. I submit this supplemental declaration in further support of Plaintiffs’ Motion for Class Counsel Fee and Expense Award and Class Representative Service Awards. Class Counsel seek \$8,900,000 in attorneys’ fees and actual costs up to \$300,000 for their work in this action that ultimately resulted in the class action settlement (“Settlement”) preliminarily approved by this Court on February 8, 2023. *See* ECF Nos. 99; 106.

**SAUDER SCHELKOPF SUPPLEMENTAL LODESTAR AND EXPENSES**

4. From August 24, 2023, to January 4, 2024, Sauder Schelkopf has spent a total of 90.3 hours litigating this case and assisting Class members, for a total lodestar of \$71,747.50. A summary of hours incurred by timekeeper, with respective rates and roles included, is below:

Name	Role	Rate	Hours	Lodestar
Matthew Schelkopf	Partner	\$825	77.10	\$63,607.50
Joseph Kenney	Partner	\$625	12.80	\$8,000.00
Juliette Mogenson	Associate	\$350	0.40	\$140.00
<b><u>Totals</u></b>			<b><u>90.30</u></b>	<b><u>\$71,747.50</u></b>

5. Attached as **Exhibit 1** to my declaration is my firm’s detailed time records for August 24, 2023, to January 4, 2024. Concurrently with this filing, we are submitting

1 our firm's supplemental detailed time records in the required Excel format for the  
2 Court's review.

3 6. From June 24 to August 23, 2023, Sauder Schelkopf incurred \$1,150.00 in  
4 costs for Plaintiffs' settlement valuation expert, Susan Thompson of Hemming Morse,  
5 LLP.

6 7. Sauder Schelkopf is continuing to incur additional time and costs and  
7 expects this to continue through final approval, the claims deadline, and perhaps on  
8 appeal. Consistent with my prior Declarations in support of Plaintiffs' Motion for Class  
9 Counsel Fee and Expense Award and Class Representative Service Awards, my firm  
10 also expects to continue assisting class members with settlement claims and related  
11 issues for the foreseeable future. *See* Dkt. 106-6 ¶¶ 40-41; Dkt. 130-2 ¶¶ 7-8.

12 8. When combined with our time and costs previously submitted to the Court  
13 on July 7, 2023, and August 25, 2023, Sauder Schelkopf has spent a total of 1,090.5  
14 total hours litigating this case, for a total lodestar of \$827,985.00. My firm has also  
15 expended \$15,783.56 in total costs.

16 I declare under penalty of perjury under the laws of the United States that the  
17 foregoing is true and correct.

18 Executed January 17, 2024, at Berwyn, Pennsylvania.

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20 By: /s/ Matthew D. Schelkopf  
Matthew D. Schelkopf  
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